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[Attorneys for additional parties in signature block]

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

COLLEEN STROEDER,

Case No. 3:19-cv-01181-HZ

Plaintiffs,

v .

**JOINT STIPULATION AND  
[PROPOSED] ORDER RE: CASE  
DEADLINES**

SERVICE EMPLOYEES  
INTERNATIONAL UNION LOCAL 503,  
OREGON PUBLIC EMPLOYEES UNION;  
KATE BROWN, in her official capacity as  
governor of OREGON; PAUL MATHER, in  
his official capacity as acting director of the  
Oregon Department of Transportation; and  
KATY COBA, in her official capacity as  
director of the Oregon Department of  
Administrative Services,

Defendants.

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### **STIPULATION**

WHEREAS, Defendant Service Employees International Union Local 503, Oregon Public Employees Union (“SEIU Local 503, OPEU”) answered Plaintiff’s complaint on September 5, 2019 (Dkt. 20);

WHEREAS, Defendants Governor Kate Brown, Paul Mather, and Katy Coba (“State Defendants”) moved to dismiss Plaintiff’s claims against them on October 16, 2019 (Dkt. 24);

WHEREAS, briefing is currently ongoing on the State Defendants’ motion to dismiss and should be completed by November 13, 2019;

WHEREAS, the resolution of the State Defendants’ motion to dismiss is likely to affect the scope of this case, including the participants, scope, and contents of meet and confer efforts the parties may undertake pursuant to Federal Rules of Civil Procedure 16 and 26;

WHEREAS, the current default case scheduling order (Dkt. 2) sets a deadline of November 28, 2019 for pretrial discovery, dispositive motions, and other pretrial matters; and

WHEREAS, to conserve party and judicial resources, and to most efficiently focus the parties’ Rule 16/26 meet and confer efforts, the parties agree that all current case deadlines other than deadlines for briefing the State Defendants’ pending motion to dismiss should be vacated, matters other than the pending motion to dismiss should be stayed, and the parties remaining in the case should meet and confer pursuant to Rule 16/26 after that motion is resolved;

THEREFORE, the parties, through their respective counsel, stipulate and request that the Court order that all current deadlines in this case other than deadlines regarding the briefing of the State Defendants’ pending Motion to Dismiss (Dkt. 24) be vacated and that proceedings in this case other than the briefing and resolution of the State Defendants’ Motion to Dismiss be stayed until the Court resolves that motion.

So stipulated,

Dated: October 29, 2019

By: /s/ Matthew J. Murray  
Matthew J. Murray

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MATTHEW J. MURRAY  
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JAMES S. COON  
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*Attorneys for Defendant SEIU Local 503, OPEU*

Dated: October 29, 2019

By: /s/ Carla A. Scott  
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*Attorneys for Defendants Governor Kate Brown, Paul  
Mather and Katy Coba*

Dated: October 29, 2019

By: /s/ Daniel R. Suhr  
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*Attorneys for Plaintiff*

**[PROPOSED] ORDER**

**It is so ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon. Marco A. Hernandez  
United States District Judge